

REMARKS

In response to the Office Action mailed September 28, 2010, Applicant hereby requests reconsideration of the rejections based upon the claim amendments and arguments submitted herewith. Claims 7-13 were presented for examination, of which all were rejected, with the following issues being raised:

1. Claims 12 and 13 were objected to due to informalities; and
2. Claims 7-13 were was rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 3,651,965 to Simonelli et al. ("Simonelli") in view of U.S. Patent No. 4,966,516 to Vartanian ("Vartanian").

Following the above amendments to the claims, claims 7-13 remain pending in the application, with claim 7 being independent. By the amendments above, the informalities in claims 12 and 13 has been corrected. Withdrawal of the objection to claims 12 and 13 is therefore requested.

Obviousness Rejections

Claim 7 was rejected as obvious over Simonelli in view of Vartanian. A *prima facie* case of obviousness requires that all limitations of the rejected claim be taught or disclosed by the cited references. MPEP 2142. The combination of Simonelli and Vartanian fail to teach or disclose many features that are recited in claim 7.

Claim 7 recites that each of the first and second rectangular frames include "a first and a second rectangular frame, the two frames being affixed to each other by a first hinge" and "wherein each of the first and second rectangular frames include ... a first fixed section disposed distal from the first hinge; and a moving section". Simonelli discloses first and second fixed plates (34, 36), but each of these are *immediately adjacent* the first hinge (35) which joins the first and second rectangular sections. Simonelli therefore does not disclose that the first and second fixed plates are "disposed distal from the first hinge".

In addition, claim 7 recites that the moving section of each of the first and second rectangular frames is "movable between an extracted position, in which the first fixed section and the moving section are adjacently disposed to form a ramp

surface, and a withdrawn position overlying the first fixed section and distal from the first hinge". Simonelli does not so much as disclose moving sections as part of the rectangular frame. While the Office Action asserts that the cable (105) and one of the cylinders (107) qualify as moving sections, neither of these parts disclosed by Simonelli move between an extracted position which is "adjacently disposed" to one of the fixed sections and a withdrawn position "overlying" one of the first sections, respectively. In making such an assertion, the Office Action completely eliminates any distinction between the terms "immediately adjacent" and "overlying".

Claim 7 also recites that each moving section "shifts into the withdrawn position due to gravity when the rectangular frames are moved into the folded position". Simonelli does not include any such teaching. Furthermore, the Office Action makes no attempt, outside of a vague and overly broad catch-all statement, to distinctly point out where Simonelli teaches this feature.

In another distinction, claim 7 recites that the suspension cable operatively extends "from the cable brake to the first and second rectangular frames near the first hinge". However, as is clearly shown in Figs. 1 & 2 of Simonelli, the disclosed suspension cable extends only to one of the two fixed plates in only one of the rectangular frames. Moreover, claim 7 recites that "the suspension cable is configured to draw the movable section of each rectangular frame into the extracted position when the rectangular frames are moved into the deployed position". However, the suspension cable disclosed by Simonelli extends only to one of the two fixed plates, and since Simonelli does not disclose any moveable sections, the suspension cable therefore is not "configured to draw the movable section of each rectangular frame into the extracted position when the rectangular frames are moved into the deployed position".

Turning to Vartanian, this reference fails to disclose any of the deficiencies noted in Simonelli above. For these reasons, the combination of Simonelli in view of Vartanian do not establish a *prima facie* case of obviousness over claim 7.

Claims 8-13 were also rejected as obvious over Simonelli in view of Vartanian, and each ultimately depends from claim 7. Where the cited combination does not

establish a *prima facie* case of obviousness over claim 7, it also does not establish a *prima facie* case of obviousness over any of these dependent claims.

Conclusion

For the foregoing reasons, Applicant requests withdrawal of the rejections. Moreover, Applicant submits that the claims are in condition for allowance, and such is earnestly solicited.

The undersigned believes no extensions or fees are due with this filing. However, if an extension is needed or a fee is due, please consider this a request therefor and charge Deposit Account No. 03-2775, under Order No. 21029-00312-US1, from which the undersigned is authorized to draw.

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Respectfully submitted,

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